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Before the
Federal Communications Commission
Washington, D.C. 20554

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

In the Matter of)
)
Amendment of Section 73.202(b)) MM Docket No. 95-85
Table of Allotments) RM-8518
FM Broadcast Stations)
(Copeland, Kansas))

To: Chief, Allocations Branch
Policy and Rules Division

DOCKET FILE COPY ORIGINAL

Comments

Great Plains Christian Radio, Inc., by its attorney and pursuant to Section 1.415 of the Commission's Rules and Regulations, hereby respectfully submits its Comments with respect to the Notice of Proposed Rule Making released by the Federal Communications Commission on June 19, 1995 (see FCC Release DA-1258) in the above-referenced matter.

On August 10, 1994, Great Plains Christian Radio, Inc. filed a "Petition for Rulemaking" seeking the allotment of Channel 280C1 to Copeland, Kansas as that community's third local FM broadcast service. Great Plains Christian Radio, Inc. respectfully requested that Channel 280C1 be designated as a non-commercial channel.

Great Plains Christian Radio, Inc. stated in its August 10, 1994 "Petition for Rulemaking" that should the Commission assign Channel 280C1 to Copeland, Kansas, the Petitioner intended to timely submit an FCC Form 340 application seeking to utilize the assignment. Consistent with that representation, Great Plains Christian Radio, Inc. hereby reiterates its support for the

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allotment of Channel 280C1* to Copeland, Kansas and its intention to apply for said channel should the FCC allot same.

Finally, footnote 1 to the FCC's Notice of Proposed Rulemaking requested that the Petitioner (i.e., Great Plains Christian Radio, Inc.) provide information showing it is eligible to acquire a second station at Copeland, Kansas. Attachment 1 hereto consists of a Section 73.3555(a)(1)(i) engineering showing which demonstrates Great Plains Christian Radio, Inc.'s eligibility to acquire a second station at Copeland, Kansas. Great Plains Christian Radio, Inc. currently operates KJIL (FM), Copeland, Kansas on a noncommercial basis. In addition, the subject channel proposed to be allotted (i.e., Channel 280C1) shall, under the above-referenced Report and Order, be designated noncommercial.

As Attachment 1 hereto demonstrates, there are a total of fifteen AM and non-reserve band FM broadcast stations that make up the Copeland, Kansas radio market (i.e., including Great Plains Christian Radio, Inc.'s current noncommercial station, KJIL (FM), Copeland, Kansas). Since there are more than 14 stations in the Copeland, Kansas "market", Section 73.3555(a)(1)(i) of the FCC's rules and regulations is not implicated.

In summation, Great Plains Christian Radio, Inc.'s current station is operated noncommercially and the proposed channel for which it intends to apply (i.e., 280C1*) shall be designated noncommercial. As such, the petitioner respectfully submits that

it is eligible to apply for and ultimately construct and operate the proposed station on Channel 280C1*.¹

Wherefore, based on the foregoing, Great Plains Christian Radio, Inc. respectfully reiterates its support for the proposed amendment of the FM Table of Allotments, Section 73.202(b) of the Commission's Rules, to include Channel 280C1*. It is Great Plains Christian Radio, Inc.'s intention to apply for Channel 280C1* if it is allotted by the FCC and, if authorized, to build the station promptly.

Respectfully submitted,

Great Plains Christian Radio, Inc.

By: Stephen C. Simpson
Stephen C. Simpson
Its Attorney

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Suite 800
Washington, D.C. 20005
(202) 408-7035

¹ Should the FCC so request, Great Plains Christian Radio, Inc. is prepared to obtain from Arbitron ratings information regarding county-by-county break-outs for the commercial stations in the Copeland, Kansas "market".

Attachment 1

**KJIL(FM)
GREAT PLAINS
CHRISTIAN RADIO, INC.
COPELAND, KS**

**COPELAND KANSAS RADIO
MARKET DUOLOGY STUDY**

AUGUST 2, 1995

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AM CITY GRADE SIGNAL STUDY
COPELAND MARKET CONTOUR MAP**

LARRY P. WAGGONER

Broadcast Technical Consultant

1712 VALLEYVIEW CT.

WICHITA, KS 67212

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ENGINEERING STATEMENT

I, Larry P. Waggoner, have been retained, by Great Plains Christian Radio, Inc. to prepare a study of the Copeland, Kansas radio market. This market is formed, for the purpose of this study, by the city grade contour of radio station KJIL(FM).

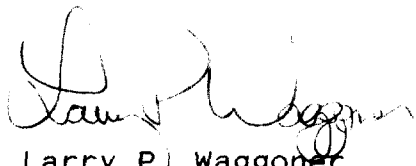
Great Plains intends to make application for non-commercial FM Class C1 operation on the proposed new Channel #280C1 allocation to Copeland, Kansas. The Channel #280 application would be co-located with their existing station KJIL(FM). The new station would operate with parameters that would nearly equal, but not exceed the coverage of KJIL.

A search was conducted to find other broadcast AM and non-reserve band FM stations with city grade contours which intersect the city grade contours of KJIL. The study disclosed eight licensed FM stations, including KJIL, and seven licensed AM stations. This count does not include the proposed new Copeland Channel #280 operation. The 3.16 mv/m contour was used for FM stations and the 5.0 mv/m contour for AM stations. The FM station data is shown in Exhibit #1, the AM in Exhibit #2.

A map showing KJIL city grade contour and transmitter site location is displayed in Exhibit #3. The city grade contours and/or transmitter sites of the fourteen other stations are also shown.

This study shows that there are a total of 15 AM and non-reserve band FM broadcast stations that make up the Copeland, Kansas radio market.

All information given in this report is true and accurate to the best of my knowledge and ability.


Larry P. Waggoner
Broadcast Technical Consultant
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Wichita, Kansas 67212-1245
316-722-3726

FM Study for: KJIL

FCC Database Date: 7/95

37-28-35

Location: COPELAND, KS

Class: C1

100-35-59

These are approximate contours. If overlap is small or close then a more detailed study may be required. *Indicates close contours

CALL STATUS	LOCATION STATE	CHANNEL CLASS	ERP:KW HAAT	LATITUDE LONGITUDE	DISTANCE BEARING	KJIL 70 dBu	OVERLAP
KOLS LIC	DODGE CITY KS	238 C1	100. .95.5	37-38-28 100-20-40	29 km 51 dg	50 km 39 km	WITHIN
KKJQ LIC	GARDEN CITY KS	247 C1	100. 97.3	37-46-48 100-27-36	36 km 20 dg	50 km 46 km	WITHIN
KYBD LIC	COPELAND KS	251 C1	100. 98.1	37-46-48 100-27-36	36 km 20 dg	50 km 43 km	WITHIN
KJIL LIC	COPELAND KS	256 C1	100. 99.1	37-28-35 100-35-59	0 km 0 dg	49 km 49 km	WITHIN
KSLS LIC	LIBERAL KS	268 C1	100. 101.5	37-03-20 100-48-40	50 km 202 dg	49 km 42 km	+40 km
KLDG LIC	LIBERAL KS	274 C1	100. 102.7	37-02-45 101-06-11	65 km 223 dg	48 km 38 km	+22 km
KFXXFM LIC	HUGOTON KS	294 C2	35. 106.7	37-19-03 101-20-16	68 km 255 dg	48 km 26 km	+6 km
KSCBFM LIC	LIBERAL KS	298 C1	100. 107.5	37-02-45 101-06-11	65 km 223 dg	48 km 38 km	+22 km

AM Study for: KJIL

FCC Database Date: 7/95

37-28-35

Location: COPELAND, KS

Class: C1 Freq 99.1 mHz

These are approximate contours. If overlap is small or close then a more detailed study may be required. *CALL Indicates close contours.

CALL STATUS	LOCATION STATE	CHANNEL CLASS	POWER PATTERN	LATITUDE LONGITUDE	DISTANCE BEARING	KJIL 5mV/m	OVERLAP
KBUF LIC	HOLCOMB KS BL-930426AB	1030 kHz Class B	1.0 kW ND	38-00-01 100-53-54	64 km 336 dg	48 km 34 km	+18 km
KGYN LIC	GUYMON OK -	1210 kHz Class B	10.0 kW ND	36-40-34 101-22-58	113 km 218 dg	48 km 74 km	+10 km
KIUL LIC	GARDEN CITY KS -	1240 kHz Class C	1.0 kW ND	37-59-52 100-54-25	64 km 335 dg	48 km 29 km	+13 km
KSCB LIC	LIBERAL KS BL-940311AB	1270 kHz Class B	1.0 kW ND	37-03-13 100-53-42	54 km 209 dg	49 km 36 km	+31 km
KGNO LIC	DODGE CITY KS BL-940224AC	1370 kHz Class B	5.0 kW ND	37-45-36 100-05-53	54 km 54 dg	50 km 55 km	+51 km
KYUU LIC	LIBERAL KS -	1470 kHz Class B	1.0 kW ND	37-03-17 100-53-06	53 km 208 dg	49 km 32 km	+28 km
KDCC LIC	DODGE CITY KS -	1550 kHz Class B	1.0 kW DA	37-47-09 100-01-55	61 km 55 dg	50 km 35 km	+24 km

KIUL (AM) site

KBUF (AM) site

EXHIBIT #3 COPELAND, KANSAS
RADIO MARKET DUOLOPY MAP
GREAT PLAINS CHRISTIAN RADIO
COPELAND, KANSAS

KJIL (FM) 3.16mv/m

KIUL (AM) 5.0mv/m

KBUF (AM) 5.0mv/m

KKJQ (FM) site

KYBD (FM) site

DODGE CITY

Larry P. Waggoner
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KS 67212-1245 (316) 722-3726

KDCC (AM) site

KGNO (AM) site

KOLS (FM) site

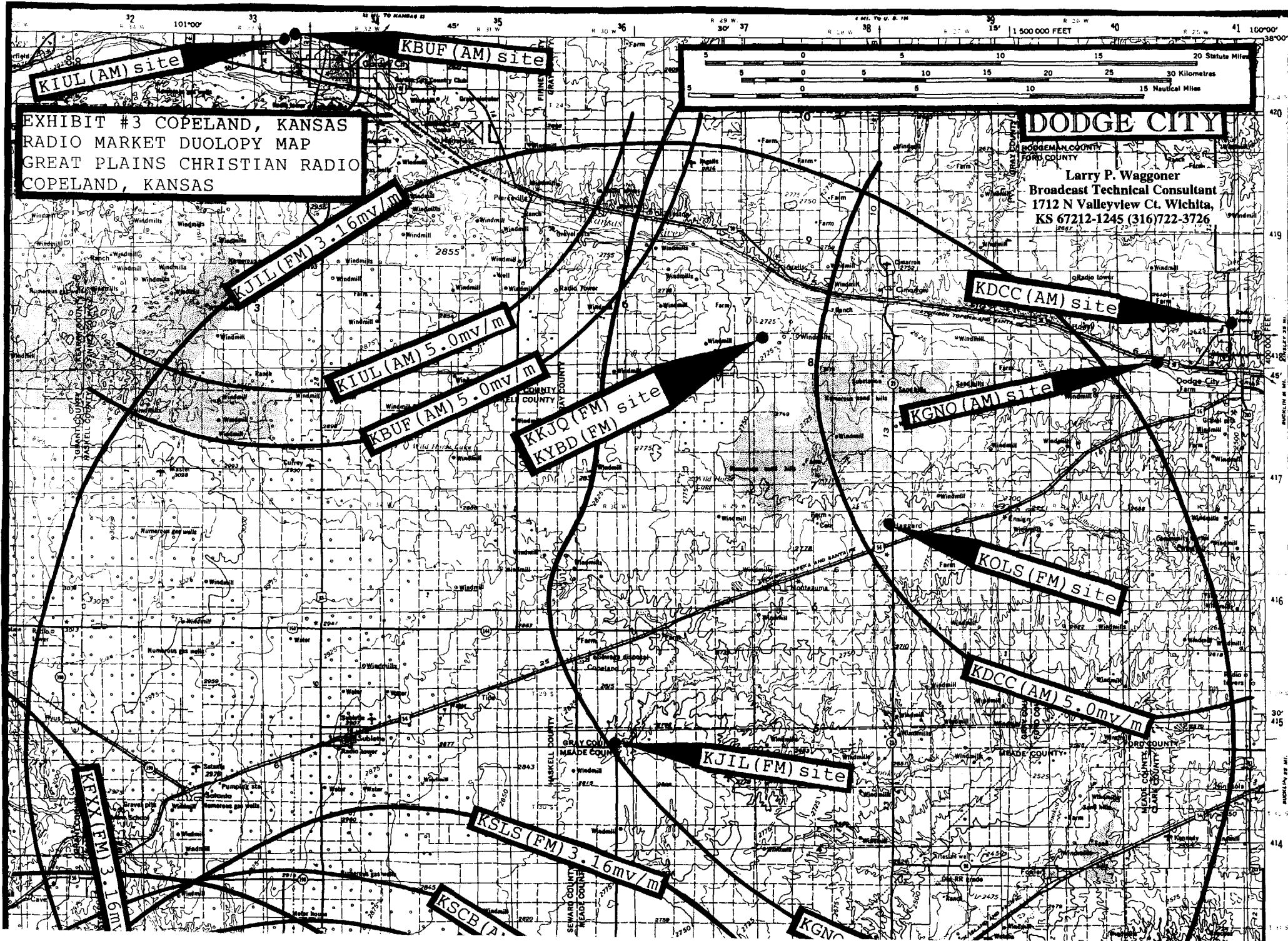
KDCC (AM) 5.0mv/m

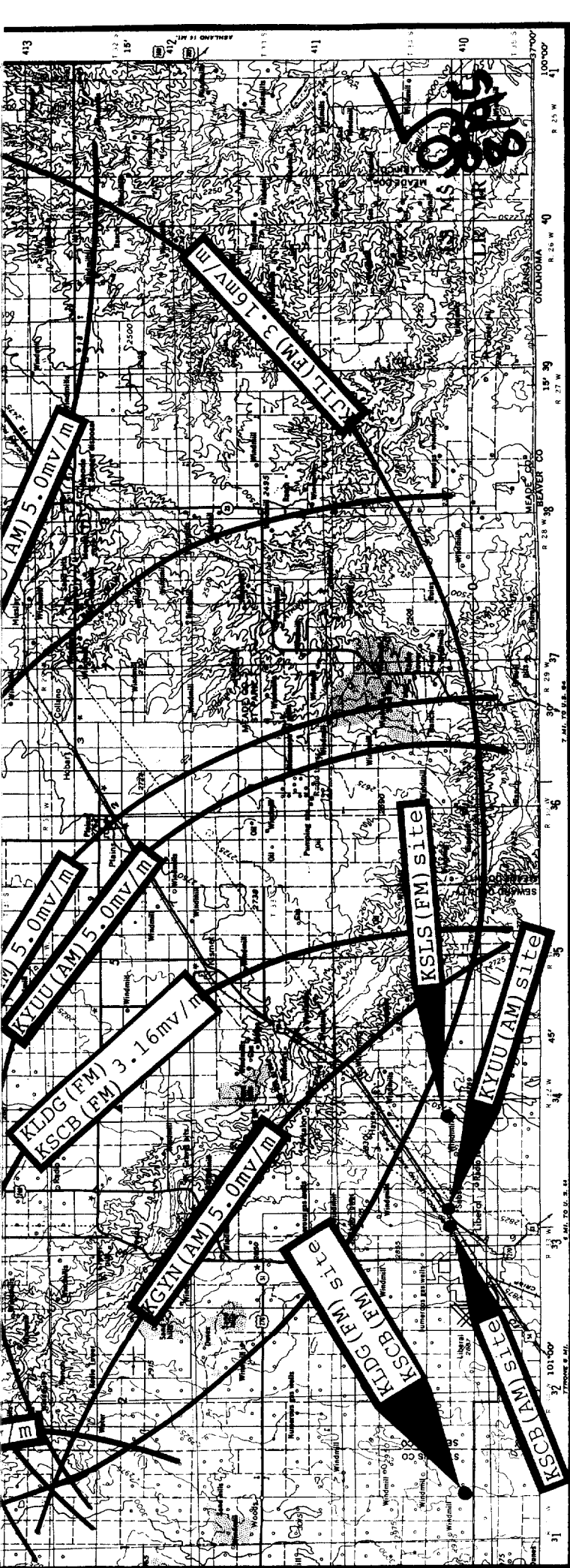
KJIL (FM) site

KSLs (FM) 3.16mv/m

KSCB (A)

KGNO





Certificate of Service

I hereby certify that a copy of the foregoing document was this 9th day of August, 1995 forwarded by courier to the following:

John A. Karousos *
Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
2025 M Street, N.W. Room 8322
Washington, D.C. 20036

Stephen C. Simpson

* By Hand Delivery to FCC's Mail Room.